

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF VERMONT

UNITED STATES OF AMERICA,)	
Plaintiff,)	
)	
v.)	Docket No. 2:18-cr-49
)	
ANGELO PETER EFTHIMIATOS,)	
Defendant.)	

OPPOSITION TO MOTION TO RECONSIDER PRETRIAL DETENTION ORDER

NOW COMES the United States of America, by and through its attorney, Christina E. Nolan, United States Attorney for the District of Vermont, and moves in opposition to defendant's motion to reconsider pretrial detention order.

As the government argued in its initial motion for detention and its response to Efthimiatos's first motion for reconsideration, the Court should detain Efthimiatos because there are no conditions of release which will assure the Court of his appearance. In his current motion, Efthimiatos again argues, in essence, that his family responsibilities will anchor him in the district and ensure his appearance at future hearings. Notably, however, the age of his home and his wife's health conditions both preceded the filing of the government's case. Thus, these same issues failed to keep Efthimiatos in compliance with this then-existing supervised release conditions when he flew to Nantucket, MA on April 9, 2018, in violation of conditions restricting his travel to within Vermont and federal criminal law.

As the court is well aware, on April 9, 2018, shortly before his charged flight, Efthimiatos was visited by his supervising Probation Officer at home. He did not request permission to travel outside the district. Nevertheless, despite his conditions of release, the attention of the Probation Office and the needs of both his wife and child, Efthimiatos chose to

leave the district, flying from Vermont to Massachusetts and back without notice to pretrial or permission of the Court. Based on his statements to agents at the time and text messages in his phone, he elected to travel that evening to visit a girlfriend in Nantucket.

While Efhitmiatos's new found commitment to his family is commendable, his utter disregard for Probation Office supervision, as well as federal law, suggest there are no conditions which he will obey or which will ensure his presence in the district and his appearance at future proceedings. He should remain detained.

Dated at Burlington, Vermont, this 15th day of November, 2018.

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